

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION**

THE SOUTH CAROLINA STATE  
CONFERENCE OF THE NAACP,

and

TAIWAN SCOTT, on behalf of himself and all  
other similarly situated persons,

Plaintiffs,

v.

HENRY D. MCMASTER, in his official  
capacity as Governor of South Carolina;  
HARVEY PEELER, in his official capacity as  
President of the Senate; LUKE A. RANKIN, in  
his official capacity as Chairman of the Senate  
Judiciary Committee; JAMES H. LUCAS, in  
his official capacity as Speaker of the House of  
Representatives; CHRIS MURPHY, in his  
official capacity as Chairman of the House of  
Representatives Judiciary Committee;  
WALLACE H. JORDAN, in his official  
capacity as Chairman of the House of  
Representatives Elections Law Subcommittee;  
HOWARD KNABB, in his official capacity as  
interim Executive Director of the South  
Carolina State Election Commission; JOHN  
WELLS, JOANNE DAY, CLIFFORD J.  
ELDER, LINDA MCCALL, and SCOTT  
MOSELEY, in their official capacities as  
members of the South Carolina State Election  
Commission,

Defendants.

Civil Action No. 3:21-cv-03302-JMC

**DEFENDANTS JAMES H. LUCAS’S,  
CHRIS MURPHY’S AND WALLACE H.  
JORDAN’S RESPONSES TO LOCAL  
RULE 26.01 INTERROGATORIES**

Defendants James H. Lucas, Chris Murphy and Wallace H. Jordan (collectively, “House Defendants”) hereby respond to Local Rule 26.01 as follows:

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

**RESPONSE: Not applicable.**

(B) As to each claim, state whether it should be tried jury or nonjury and why.

**RESPONSE: All of the claims alleged in the Complaint should be tried nonjury, because Plaintiffs seek only declaratory, injunctive, or other purported equitable relief and because Plaintiffs have not demanded a jury trial on any claim so triable.**

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

**RESPONSE: Not applicable.**

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See* Local Civ. Rule 3.01 (D.S.C.).

**RESPONSE: Plaintiffs filed this action in the Columbia Division of the United States District Court for the District of South Carolina. The House Defendants do not presently object to or challenge the appropriateness of this division pursuant to Rule 3.01 of the Local Civil Rules (D.S.C.), but reserve the right to assert defenses related to the appropriateness of this action generally.**

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

**RESPONSE: At this time, the House Defendants are not aware of any related actions filed in the United States District Court for the District of South Carolina.**

(F) If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

**RESPONSE: The House Defendants are being sued in their official capacities and are properly identified.**

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

**RESPONSE: Not applicable.**

*(signature page to follow)*

Respectfully submitted,

s/Andrew A. Mathias

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October 22, 2021  
Greenville, South Carolina